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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**THE RESCAP BORROWER CLAIMS TRUST’S COUNTER-
DESIGNATION OF ITEMS FOR RECORD ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure and Rule 8007-1 of the Local Bankruptcy Rules for the Southern District of New York, the ResCap Borrower Claims Trust (the “**Borrower Trust**”), established pursuant to the terms of the *Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors* [Docket No. 6030] (the “**Plan**”)¹ in the above-captioned Chapter 11 cases (the “**Chapter 11 Cases**”), hereby submits the following counter-designation of additional items to be included in the record on appeal in connection with the Notice of Appeal [Docket No. 9192] filed by appellant Michael E. Boyd (the “**Appellant**”), from the *Order Sustaining ResCap*

¹ The Plan was confirmed by order of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) dated December 11, 2013 [Docket No. 6065] and the Plan’s effective date occurred on December 17, 2013. The Plan provides for the creation and implementation of the Borrower Trust. *See* Plan, Art. IV.F. The Plan further provides that the Borrower Claims Trustee is deemed the representative of the Debtors’ estates for the purpose of prosecuting objections to borrower claims, *see* Plan, Art. IV.S.

Borrower Claims Trust's Objection to Claim No. 960 Filed by Michael E. Boyd [Docket No. 9120] which was entered by the Bankruptcy Court on September 8, 2015.²

The Borrower Trust designates the following additional items to be included in the record on appeal.

A. Pleadings

Docket No.	Description
2093	Order Extending Deadline for Filing Proofs of Claim
3294	Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1009, 3007 and 9019(b) Approving (I) Claim Objection Procedures, (II) Borrower Claim Procedures, (III) Settlement Procedures, and (IV) Schedule Amendment Procedures
6065	Order Confirming Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, <i>et al.</i> and the Official Committee of Unsecured Creditors
6137	Notice of Entry of Confirmation Order Confirming the Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, <i>et al.</i> and the Official Committee of Unsecured Creditors and Occurrence of the Effective Date
7552	ResCap Borrower Claims Trust's Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims)
7701	Answer in Opposition of Michael Boyd Secured Claimant # 960 to ResCap Borrower Claims Trust's Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims) (The "Omnibus Objection")
7703	Addendum to Answer in Opposition of Michael Boyd Secured Claimant # 960 to ResCap Borrower Claims Trust's Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims) (The "Omnibus Objection")
7825	ResCap Borrower Claims Trust's Omnibus Reply in Support of its Seventy-Fifth Omnibus Objection to Claims (No Liability Borrower Claims) as to Claim No. 960 Filed by Michael Boyd
7858	Letter to Judge Glenn from Jordan Wishnew Regarding the ResCap Borrower Claims Trust's Objection to Proof of Claim No. 960 Filed by Michael Boyd

² For the avoidance of doubt, with regard to any pleadings and/or exhibit lists designated by the Borrower Trust, the Borrower Trust also designates any and all exhibits filed with, attached to, or otherwise referenced in such documents. For the further avoidance of doubt, the Borrower Trust designates all items designated by Appellants in Docket No. 9229, Case No. 12-12020 (MG) and all exhibits filed with, attached to, or otherwise referenced in such documents.

Docket No.	Description
7859	Memorandum Opinion and Order Overruling the ResCap Borrower Claims Trust's Objection to Claim No. 960 Filed by Michael Boyd
8042	ResCap Borrower Claims Trust's Eighty-Second Omnibus Objection to Claims (No Liability Borrower Claims)
8190	Opposition of Michael Boyd Secured Creditor to Motion of the ResCap Liquidating Trust for Final Decree Closing Certain Jointly Administered Chapter 11 Cases, ResCap Borrower Claims Trust's Eighty-Second Omnibus Objection to Claims (No Liability Borrower Claims), and Counter Motion to Hold Case in Abeyance During Pendency of Administrative Claim Before US Treasury Department
8191	Amended Opposition of Michael Boyd Secured Creditor to Motion of the ResCap Liquidating Trust for Final Decree Closing Certain Jointly Administered Chapter 11 Cases, ResCap Borrower Claims Trust's Eighty-Second Omnibus Objection to Claims (No Liability Borrower Claims), and Counter Motion to Hold Case in Abeyance During Pendency of Administrative Claim Before US Treasury Department
8305	Reply to No Answer to Counter Motion to Grant Claim to Hold Case in Abeyance During Pendency of Administrative Claim Before US Treasury Department Filed By Michael E. Boyd
8366	ResCap Borrower Claims Trust's Omnibus Reply in Support of its Eighty-Second Omnibus Objection to Claims (No Liability Borrower Claims) as to Claim Nos. 960, 1142, and 4497
8388	Request to Stay Michael Boyd Secured Creditor to ResCap Borrower Trust's Eighty-Second Omnibus Objection to Claims (No Liability Borrower Claims) Filed by Michael E. Boyd
8420	Memorandum Opinion and Order Overruling ResCap Borrower Claims Trust's Objection to Claim Number 960 Filed by Michael E. Boyd
8859	ResCap Borrower Claims Trust's Eighty-Eighth Omnibus Objection to Claims ((I) No Liability Borrower Claims and (II) Reduce and Allow Borrower Claims)

B. Other

Docket No.	Description
7874	Transcript of Hearing held on December 10, 2014 at 10:10 a.m. (Prevailing Eastern Time)
8418	Transcript of Hearing held on March 31, 2015 at 10:04 a.m. (Prevailing Eastern Time)
9054	Transcript of Hearing held on August 20, 2015 at 10:05 a.m. (Prevailing Eastern Time)

Docket No.	Description
N/A	Proof of Claim Number 960 Filed by Michael E. Boyd on October 4, 2012

Dated: October 15, 2015
New York, New York

/s/ Norman S. Rosenbaum

Norman S. Rosenbaum

Jordan A. Wishnew

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